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6 Attorneys for Defendant
KENNETH JAY LAITMAN
7 *also known as* John Roosevelt Rodman

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH JAY LAITMAN, *also*
15 *known as* John Roosevelt Rodman,

16 Defendant.

Case No. 1:22-cr-00154-ADA-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER**

Date: October 11, 2023

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant
19 Federal Defender Erin Snider, counsel for Kenneth Jay Laitman, also known as John Roosevelt
20 Rodman, that the status conference currently scheduled for July 26, 2023, at 1:00 p.m. may be
21 continued to October 11, 2023, at 1:00 p.m.

22 The parties agree and request that the Court make the following findings:

- 23 1. By previous order, this matter was set for a status conference on July 26, 2023.
24 2. The government has produced 8,089 bates-marked items in this matter.
25 3. On June 26, 2023, the government extended a plea offer.
26 4. Counsel for the defendant requires additional time to review discovery, consult
27 with her client regarding the case, conduct necessary investigation, and engage in further plea
28 negotiations.

1 5. Counsel for the defendant believes that failure to grant the above-requested
2 continuance would deny her the reasonable time necessary for effective preparation, taking into
3 account the exercise of due diligence.

4 6. The government does not object to the continuance.

5 7. Based on the above-stated findings, the ends of justice served by continuing the
6 case as requested outweigh the interest of the public and the defendant in a trial within the
7 original date prescribed by the Speedy Trial Act.

8 8. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
9 *et seq.*, within which trial must commence, the time period of July 26, 2023, to October 11, 2023,
10 inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

11 **IT IS SO STIPULATED.**

12 Respectfully submitted,

13 PHILLIP A. TALBERT
14 United States Attorney

15 Date: July 19, 2023

16 /s/ Joseph Barton
17 JOSEPH BARTON
18 Assistant United States Attorney
19 Attorney for Plaintiff

20 HEATHER E. WILLIAMS
21 Federal Defender

22 Date: July 19, 2023

23 /s/ Erin Snider
24 ERIN SNIDER
25 Assistant Federal Defender
26 Attorney for Defendant
27 KENNETH JAY LAITMAN, also known as
28 John Roosevelt Rodman

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ORDER

IT IS SO ORDERED that the status conference is continued from July 26, 2023, to **October 11, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: **July 19, 2023**

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE